

# EXHIBIT

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## Shelly Bloor

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**From:** Will Cochran  
**Sent:** Wednesday, February 26, 2020 4:48 PM  
**To:** Chris Williams  
**Subject:** FW: Depos

**From:** Bill Burns <bburns@watsonburns.com>  
**Sent:** Tuesday, February 18, 2020 4:03 PM  
**To:** MMclaren <MMclaren@blackmclaw.com>  
**Cc:** ohorton@wyattfirm.com; rcraddock@wyattfirm.com; Brice Timmons <btimmons@blackmclaw.com>; Frank Watson <fwatson@watsonburns.com>; Will Cochran <wcochran@blackmclaw.com>; Will Routt <wroutt@watsonburns.com>; lee.whitwell@shelbycountyttn.gov  
**Subject:** Re: Depos

Counsel:

These depositions have been properly noticed. Not sure why plaintiffs would approach the court about this issue that we have been talking about for months.

If the noticed witnesses are not produced or otherwise don't show as noticed, please be advised that we will move for a default judgment for failure to cooperate in discovery.

William F. Burns, Esq.  
Watson Burns, PLLC

Sent from my iPhone

On Feb 18, 2020, at 2:49 PM, "[MMclaren@blackmclaw.com](mailto:MMclaren@blackmclaw.com)" <[MMclaren@blackmclaw.com](mailto:MMclaren@blackmclaw.com)> wrote:

Odell, your understanding is not correct. We have always maintained that we are mindful of the Court's Orders and will conduct these depositions accordingly. If you disagree with our questions you can object. Or, you can seek a protective order now. Are you going to produce these non 30 (b) (6) witnesses? A simple yes or no will suffice so we can approach the Court. Thanks, Mike

Michael G. McLaren  
Black McLaren Jones Ryland & Griffiee  
530 Oak Court Dr., Ste. 360  
Memphis, TN 38117  
901-270-6525

Sent from my iPhone

On Feb 18, 2020, at 2:43 PM, Horton, Odell <[ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)> wrote:

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Mike,

Shelby County wants to understand Plaintiffs' positions before answering your question. It is our understanding Plaintiffs will withdraw their 30(b)(6) Deposition Notice to Shelby County. It is also our understanding Plaintiffs would issue new deposition notices to the Shelby County employees with the understanding their depositions are for class certification purposes only and Plaintiffs would limit their questions to class issues. Please let me know if my understanding is correct regarding these issues.

Thank you.

Odell

Odell Horton Jr.

Wyatt, Tarrant & Combs, LLP

Direct: (901) 537-1082

From: [MMcLaren@blackmclaw.com](mailto:MMcLaren@blackmclaw.com) <[MMcLaren@blackmclaw.com](mailto:MMcLaren@blackmclaw.com)>

Sent: Monday, February 17, 2020 3:55 PM

To: Craddock, Bob <[rcraddock@wyattfirm.com](mailto:rcraddock@wyattfirm.com)>; Horton, Odell <[ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)>

Cc: [btimmons@blackmclaw.com](mailto:btimmons@blackmclaw.com); [fwatson@watsonburns.com](mailto:fwatson@watsonburns.com); [wcochran@blackmclaw.com](mailto:wcochran@blackmclaw.com); [wroutt@watsonburns.com](mailto:wroutt@watsonburns.com); [bburns@watsonburns.com](mailto:bburns@watsonburns.com)

Subject: Depos

Bob, Odell, you have several Depo notices - do you intend to produce anyone on the dates noticed. Just a simple yes or no please.

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